

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
	§	
Debtors.	§	Hearing Date: August 5, 2021
	§	Hearing Time: 2:00 p.m. (Central Time)
	§	Hearing Location: Courtroom 5 North
	§	111 S. 10th St., St. Louis, MO 63102

**NOTICE OF THE PLAN ADMINISTRATOR'S NINETEENTH  
OMNIBUS OBJECTION TO CLAIMS ON GROUNDS OF NO LIABILITY**

**THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.**

**IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37<sup>TH</sup> FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON JULY 29, 2021.**

**FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.**

**Important Information Regarding the Objection**

**1. Grounds for the Objection.** By this Objection, the Plan Administrator, on behalf of the Wind-Down Estates of the Debtors, is seeking to **disallow** your claim(s) on the grounds that each represents a claim that the Plan Administrator believes is a No Liability

Claim.<sup>1</sup> The claim(s) subject to the Objection is/are listed in the table attached to the Objection as **Exhibit A**.

### **Resolving the Objection**

2. **Parties Required to File a Response**. If you disagree with the Objection filed with respect to any of your claims, you may file a response (each, a “**Response**”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

3. **Response Contents**. Each Response should contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, and the Objection and claim or claims within the Objection to which the Response is directed;
- b. a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim(s), including the factual and legal bases upon which you rely in opposing the Objection;
- c. copies of documentation or other evidence of your claim (not previously filed with proof of such claim) on which your Response is based (excluding confidential, proprietary, or other protected information, copies of which must be provided to the counsel to the Plan Administrator, subject to appropriate confidentiality constraints, if any); and
- d. the following contact information:
  - (i) your name, address, telephone number, and email address or the name, address, telephone number, and email address of your attorney or designated representative to whom the attorneys for the Plan Administrator should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on your behalf (to the extent different from the information detailed in paragraph 3(d)(i) above).

4. **Response Deadline**. Your Response must be filed with the Court and served so as to be *actually received* by **11:59 p.m. (Central Time) on July 29, 2021** (the “**Response Deadline**”).

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<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Debtors’ Second Amended Joint Plan (the “**Plan**”).

5. **Failure to Respond.** A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent an agreement with the Plan Administrator resolving the Objection to a claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing.** Upon entry of an order, you will be served with a notice of entry, and a copy, of the order.

#### **Hearing on the Objection**

6. **Date, Time, and Location.** If necessary, a hearing (the “Hearing”) on the Objection will be held on **August 5, 2021 at 2:00 p.m. (Central Time) in the United States Bankruptcy Court for the Eastern District of Missouri, 5th Floor, North Courtroom, Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri.** Such Hearing may be adjourned from time to time in these chapter 11 cases in the Plan Administrator’s sole discretion. **You must attend the Hearing if you disagree with the Objection and have filed a Response.** If you file a Response in accordance with the response procedures herein, but such Response is not resolved prior to the Hearing, and you appear at the Hearing, the Objection may be heard at the Hearing or adjourned to a subsequent hearing in the Plan Administrator’s sole discretion. If a subsequent hearing is determined to be necessary, the Plan Administrator will file with the Court and serve you with a notice of the subsequent hearing (the date of which will be determined in consultation with the affected claimant(s)).

#### **Additional Information**

7. **Questions or Information.** Copies of the pleadings (collectively, the “Pleadings”) filed in these chapter 11 cases are available at no cost at the Debtors’ case website <http://www.kccllc.net/Briggs>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court’s website at <https://pcl.uscourts.gov/pcl/>. A login identification and password to the Court’s Public Access to Court Electronic Records (“PACER”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

#### **Reservation of Rights**

**NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (I) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR; (II) A WAIVER OF ANY PARTY’S RIGHT TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS; (III) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (IV) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THE MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THE MOTION; (V) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (VI) A WAIVER OF THE PLAN ADMINISTRATOR’S RIGHTS UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.**

Dated: June 29, 2021  
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO  
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*Local Counsel to the Plan Administrator*

-and-

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*Counsel to the Plan Administrator*

**Exhibit A**

**Schedule of No Liability Claims**

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
1) Ace Hardware Corporation  Attn Kurt M. Carlson C/O Carlson Dash, LLC 216 S. Jefferson Street, Suite 504 Chicago, IL 60661	20-43597	Briggs & Stratton Corporation	1647	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$39,870.00 \$0.00 \$0.00 \$0.00 \$39,870.00	The claimant attached no support to validate this claim and Plan Administrator could not cross-reference with any liability on Debtors' books and records.
2) Aerotek Inc  7301 Pkwy Dr Hanover, MD 21076-1159	20-43597	Briggs & Stratton Corporation	55	8/11/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$6,270.49 \$6,270.49	The Debtors books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
3) Alan Burger  7005 Washington Road West Palm Beach, FL 33405	20-43597	Briggs & Stratton Corporation	10	7/28/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$1,767.45 \$1,767.45	The claim relates to a product warranty, which was assumed by the Court-approved purchaser of substantially all of the Debtors' assets, Bucephalus Buyer, LLC.
4) Alan Kroeger  N112W17500 Mequon Rd, Apt 304 Germantown, WI 53022	20-43597	Briggs & Stratton Corporation	746	9/25/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$7,413.12 \$7,413.12	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
5) Albert J. Graul Jr.  Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1436	10/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	The underlying case relating to this litigation-related claim has been closed.
6) Andrew Spehert  7613 W Drexel Ave Franklin, WI 53132	20-43597	Briggs & Stratton Corporation	503	9/13/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$13,650.00 \$29,447.45 \$43,097.45	Per the Debtors' books and records, the employee did not sign a separation agreement which is a requirement to be paid, therefore no amounts are owing to the claimant.
7) Annie Mcswain  3745 N. 83Rd St. Milwaukee, WI 53222	20-43597	Briggs & Stratton Corporation	1708	9/30/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	The claimant did not attach enough support to validate the amount.
8) April Tucker Baker  1818 Bluestone Court Auburn, AL 36830	20-43597	Briggs & Stratton Corporation	1701	10/7/2020	Secured: Administrative: Priority: Unsecured:	\$0.00 \$0.00 \$0.00 \$6,450.83	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
					Total:	\$6,450.83	
9) Army And Air Force Exchange Service (AAFES)  Attn Kimberly Bailey PO Box 650060 Dallas, TX 75265	20-43597	Briggs & Stratton Corporation	562	9/15/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$2,758.02 \$2,758.02	The debtors books and records show no liability owed to this claimant.
10) Arrow Gates & Security  219 W Mason St Odessa, MO 64076-1262	20-43597	Briggs & Stratton Corporation	195	8/19/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$160.00 \$160.00	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
11) Augusta Fuel Company  4 Northern Ave Augusta, ME 04330-4250	20-43597	Briggs & Stratton Corporation	1974	10/2/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	Claim asserts that no amount is owed to the claimant.
12) Auto Kthler Gmbh & Co.  Schlachthausstrasse 6A Bad Dsrkheim, 67098 Germany	20-43599	Briggs & Stratton International, Inc.	6	9/28/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	Claim asserts that no amount is owed to the claimant.
13) Barbara Decker  3303 N. Valley View Rd Ashland, OR 97520	20-43597	Briggs & Stratton Corporation	2134	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$9,980.00 \$9,980.00	The claimant did not attach enough support to validate the amount.
14) Barbara Startz  12303 W. Center Street 1A Wauwatosa, WI 53222	20-43597	Briggs & Stratton Corporation	861	9/15/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$8,000.00 \$8,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
15) Barry Monroe Parrish  137 Crest Drive Sterrett, AL 35147	20-43597	Briggs & Stratton Corporation	495	9/11/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$5,622.90 \$0.00 \$5,622.90	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
16) Billie H. Ladd	20-43597	Briggs & Stratton Corporation	2144	10/7/2020	Secured:	\$0.00	The claimant did not attach enough

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
Billie Ladd 210 Edwards St. New Haven, CT 06511					Administrative:	\$0.00	support to validate the amount.
					Priority:	\$25,000.00	
					Unsecured:	\$0.00	
					Total:	\$25,000.00	
17) Billy J Schaut  1060 Woodview Dr Grafton, WI 53024	20-43597	Briggs & Stratton Corporation	1694	10/7/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$149,620.80	
					Total:	\$149,620.80	
18) Billy J Schaut  1060 Woodview Dr Grafton, WI 53024	20-43597	Briggs & Stratton Corporation	1695	10/7/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$8,000.00	
					Total:	\$8,000.00	
19) Bradley Hasbrouck  74011 Hwy 283 Elwood, NE 68937	20-43598	Allmand Bros., Inc.	74	11/9/2020	Secured:	\$0.00	Per the Debtors' books and records, the Debtors have no record of any liability due and owing to the claimant.
					Administrative:	\$75.34	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$75.34	
20) Brent Kenneth Laponsey  Brent K Laponsey 10377 W. Mt Morris Rd Flushing, MI 48433	20-43597	Briggs & Stratton Corporation	1787	9/28/2020	Secured:	\$0.00	The claimant attached no support to validate this claim, and the debtors found no activity with this claimant in their records.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$10,000.00	
					Total:	\$10,000.00	
21) Brian Bockholt  1760 Boat Launch Rd Kissimmee, FL 34746-4551	20-43597	Briggs & Stratton Corporation	470	9/10/2020	Secured:	\$0.00	Per the Debtors' books and records, the Debtors have paid the severance amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$13,244.61	
					Unsecured:	\$0.00	
					Total:	\$13,244.61	
22) Briggs & Stratton Pension Plan (Pn 007)  U.S. DOL, EBSA Fbo Briggs & Stratton Pension 230 S. Dearborn St., Ste. 2160 Chicago, IL 60604	20-43597	Briggs & Stratton Corporation	853	9/30/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an amount distinct from the allowed claim of the PBGC under the Debtors' confirmed Plan.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	
23) Bruno R Babits  N67W22208 Willow Lane, Lot G33 Sussex, WI 53089	20-43597	Briggs & Stratton Corporation	2401	11/6/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount for retiree benefits independent of the claim of the PBGC.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	



**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
24) Bulloch County Board Of Commissioners  115 North Main St. Statesboro, GA 30458	20-43597	Briggs & Stratton Corporation	2561	1/18/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$7,634.30 Total: \$7,634.30	The debtors have not received the invoices asserted as owed by the vendor, and the claimant did not attach copies of the asserted invoices to validate this claim.
25) Cei Security & Sound  1000 E 2nd St Po Box 161 Hastings, NE 68902	20-43598	Allmand Bros., Inc.	16	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,014.01 Total: \$1,014.01	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
26) Chem-Trend Lp  PO Box 860 Howell, MI 48844	20-43597	Briggs & Stratton Corporation	399	9/9/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$37,163.90 Total: \$37,163.90	The claimant attached no support to validate this claim.
27) Chongqing Mexin Yishen Machinery Co Ltd  C/O Peter Geldes Brown & Joseph, LLC Po Box 249 Itasca, IL 60143	20-43597	Briggs & Stratton Corporation	375	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$434,809.55 Total: \$434,809.55	Documentation attached to filed claim does not substantiate amount asserted as owed. Invoices appear unrelated to the Debtors' business.
28) Christopher J. Mullen  1441 State Hwy 164 Hubertus, WI 53033	20-43597	Briggs & Stratton Corporation	518	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$28,503.15 Total: \$42,153.15	Per the Debtors' books and records, the Debtors have no record of any liability due and owing to the claimant.
29) Christopher L Fazi  9730 State Route 564 Farmington, KY 42040	20-43597	Briggs & Stratton Corporation	996	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$67,144.48 Total: \$67,144.48	Per the Debtors' books and records, the employee did not sign a separation agreement and no amounts are owing to the claimant.
30) Circular Concepts  Bruce Rhoades 1003 Aucutt Road Montgomery, IL 60538	20-43597	Briggs & Stratton Corporation	2300	10/30/2020	Secured: \$0.00 Administrative: \$6,692.44 Priority: \$0.00 Unsecured: \$0.00 Total: \$6,692.44	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
31) Collins Einhorn Farrell PC	20-43597	Briggs & Stratton Corporation	1347	9/22/2020	Secured: \$0.00 Administrative: \$0.00	The claim relates to legal services provided on behalf of the debtors'

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification	
				Claim Amount and Priority			
C/O Daniel Collins 4000 Town Center, Floor 9 Southfield, MI 48075				Priority:	\$0.00	insurance providers and is the responsibility of the same insurance providers.	
				Unsecured:	\$1,137.00		
				Total:	\$1,137.00		
32) Comptroller of Maryland  301 West Preston Street, Room 409 Baltimore, MD 21201-2383	20-43597	Briggs & Stratton Corporation	2526	2/3/2021	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$18,477.00 \$0.00 \$18,477.00	Per the Debtors' books and records, no amount is owed to the claimant
33) Conductor LLC  2 Park Ave. Ste 1501 New York, NY 10016	20-43597	Briggs & Stratton Corporation	60	8/3/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$20,000.00 \$20,000.00	The claim is for a pre-petition software cancellation fee charged by the vendor, which the Debtors did not agree to and was not otherwise subject to contract.
34) Craig Allan Claerbout  5550 West Lake Dr West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	181	8/18/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$264,337.00 \$264,337.00	Per the Debtors' books and records, the Debtors did not make any agreements regarding compensation so there are no amounts owing to the claimant.
35) Craig M Lieber Sr  9140 N Goldendale Drive Brown Deer, WI 53223	20-43597	Briggs & Stratton Corporation	292	8/27/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$16,320.00 \$1.00 \$16,321.00	Court approved the termination of the Retiree Health and Welfare Benefits
36) Craig Zavett  5138 Cypress Creek Dr Orlando, FL 32811	20-43597	Briggs & Stratton Corporation	1398	10/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$3,860.00 \$3,860.00	The claimant did not attach enough support to validate the amount.
37) Crown Equipment Corporation Dba Crown Lift Trucks  C/O Robert Hanseman, Attorney & Agent Sebaly Shillito + Dyer LPA 40 N. Main St., Ste. 1900 Dayton, OH 45423	20-43597	Briggs & Stratton Corporation	2480	11/17/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$1,993.68 \$0.00 \$0.00 \$1,993.68	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
38) Daniel J Bagin  N60W24632 Lynette Pass Sussex, WI 53089	20-43597	Briggs & Stratton Corporation	1068	10/3/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$243,132.80 \$243,132.80	Court approved the termination of the Retiree Health and Welfare Benefits

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
39) Danny O. Hudspeth  1001 Sharpe Street Murray, KY 42071	20-43597	Briggs & Stratton Corporation	2111	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,600.17 Total: \$48,250.17	Claimant is still an active employee so there is no severance liability.
40) Dave Hensel Electric Inc  22311 Shaw Rd Ste A1 Sterling, VA 20166-2354	20-43597	Briggs & Stratton Corporation	896	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$673.58 Total: \$673.58	The Debtors' books and records show no liability owed to this claimant.
41) David A Gavinski  5768 Willow Lane Allenton, WI 53002	20-43597	Briggs & Stratton Corporation	1713	9/25/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate an allowed amount.
42) David T Mauer  10421 S Justin Dr Oak Creek, WI 53154	20-43597	Briggs & Stratton Corporation	1094	10/4/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,024.60 Total: \$11,024.60	The claimant did not attach enough support to validate the amount.
43) David Thompson  5409 Bauers Drive West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	1445	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$32,053.00 Total: \$32,053.00	Court approved the termination of the Retiree Health and Welfare Benefits
44) David Thompson  5409 Bauers Drive West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	1482	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,061.98 Unsecured: \$0.00 Total: \$2,061.98	Per the Debtors' books and records, there is no record of any liability due relating to COBRA owing to the claimant.
45) Dawn M. Christensen  N78W15356 Rosewood Dr. Menomonee Falls, WI 53051	20-43597	Briggs & Stratton Corporation	2458	11/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate an allowed amount.
46) Deanna Jackson  5440 Camp Meeting Rd	20-43597	Briggs & Stratton Corporation	725	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00	The claim is for a pre-petition product warranty liability, which was assumed by the Court-approved purchaser of

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
Center Valley, PA 18034-1803					Unsecured:	\$1,199.00	substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Total:	\$1,199.00	
47) Don S Schoonenberg  PO Box 130 Summit Lake, WI 54485	20-43597	Briggs & Stratton Corporation	1661	10/7/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$131,570.00	
					Total:	\$131,570.00	
48) Doreen Moore  26532 Lilac Lane Apt. 5 Wind Lake, WI 53185	20-43597	Briggs & Stratton Corporation	811	9/28/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	
49) Dorothy Smith  3930 N 39th St Milwaukee, WI 53216-2517	20-43597	Briggs & Stratton Corporation	1119	9/23/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$6,000.00	
					Total:	\$6,000.00	
50) E. Raymond Alexander III, Executor Of The Estate  Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1628	10/7/2020	Secured:	\$0.00	The underlying case relating to this litigation-related claim has been dismissed.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$50,000.00	
					Total:	\$50,000.00	
51) Eaton Peabody PA  100 Middle Street PO Box 15235 Portland, ME 04101	20-43597	Briggs & Stratton Corporation	1662	11/6/2020	Secured:	\$0.00	The invoices asserted as owed are from 2013 and 2014 and are inconsistent with the Debtors' records.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$9,467.32	
					Total:	\$9,467.32	
52) Edward Heard  644 Ann Street Alexander City, AL 35010	20-43597	Briggs & Stratton Corporation	165	8/15/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$7,500.00	
					Total:	\$7,500.00	
53) Elaine Norland Holdings, Inc., F/K/A A Cone Zone, Inc.  Attn Elaine C Norland, President/CEO A Cone Zone, Inc. 1640 Market St Corona, CA 92880	20-43597	Briggs & Stratton Corporation	675	9/14/2020	Secured:	\$0.00	Claim asserts that no amount is owed to the claimant.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
54)	Ernest Groves  PO Box 1567 Longmont, CO 80502	20-43597	Briggs & Stratton Corporation	817	9/28/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$47,500.00	
						Total:	\$47,500.00	
55)	Estelle Love  4231 N. 24th St Milwaukee, WI 53209	20-43597	Briggs & Stratton Corporation	870	9/15/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
56)	Exponent, Inc.  Eric Anderson 149 Commonwealth Dr Menlo Park, CA 94025	20-43597	Briggs & Stratton Corporation	1759	9/25/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$35,571.35	
						Total:	\$35,571.35	
57)	Framuer - Halbach GmbH  Jan-Wellem-Str. 4 Remscheid, 42830 Germany	20-43597	Briggs & Stratton Corporation	1980	10/6/2020	Secured:	\$0.00	Claim asserts that no amount is owed to the claimant.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
58)	Franklin M Baxter  1092 E. University Dr. Auburn, AL 36830	20-43597	Briggs & Stratton Corporation	1700	10/7/2020	Secured:	\$0.00	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$5,667.90	
						Unsecured:	\$0.00	
						Total:	\$5,667.90	
59)	Fred R. Thomas  3268 Green Acres Central Point, OR 97502	20-43597	Briggs & Stratton Corporation	2024	10/2/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$10,895.50	
						Total:	\$10,895.50	
60)	Frederick Heinzelmann  W264N6455 Hillview Dr Sussex, WI 53089-3450	20-43597	Briggs & Stratton Corporation	991	10/3/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$60,955.39	
						Total:	\$60,955.39	
61)	Frederick J Heinzelmann  W264N6455 Hillview Dr Sussex, WI 53089-3450	20-43597	Briggs & Stratton Corporation	804	9/28/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$4,115.49	

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
					Total:	\$4,115.49	
62) George Calvert Reed  PO Box 1369 Eagle Point, OR 97524	20-43597	Briggs & Stratton Corporation	2133	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$5,087.50 \$5,087.50	The claimant did not attach enough support to validate the amount.
63) Guadalupe Medina  907 Western Avenue Mosinee, WI 54455	20-43597	Briggs & Stratton Corporation	874	9/15/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$8,000.00 \$8,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
64) Heather Barks  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1551	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$625.00 \$0.00 \$625.00	The claimant did not attach enough support to validate that amounts due to her under COBRA were unpaid obligations of the Debtors.
65) Heather Barks  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1553	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$674.40 \$0.00 \$674.40	The claimant did not attach enough support to validate the assertion or amount of alleged unpaid PTO.
66) Higgins, Cavanagh & Cooney, LLP  10 Dorrance Street, Suite 400 Providence, RI 02903	20-43597	Briggs & Stratton Corporation	2492	11/23/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$7,150.00 \$0.00 \$0.00 \$7,150.00	The claim relates to legal services provided on behalf of the Debtors' insurance providers and is the responsibility of the same insurance providers.
67) Higgins, Cavanagh & Cooney, LLP  10 Dorrance Street, Suite 400 Providence, RI 02903	20-43597	Briggs & Stratton Corporation	1627	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$43,136.08 \$43,136.08	The asserted invoices relate to legal services on behalf of insurance providers and the insurance providers are liable for these invoices.
68) Hill Country Outdoor Power  2914 Montopolis Ste 200 Austin, TX 78741	20-43597	Briggs & Stratton Corporation	1749	9/28/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$93.64 \$93.64	The claim is for a pre-petition product warranty liability, which was assumed by the Court-approved purchaser of substantially all of the Debtors' assets, Bucephalus Buyer, LLC.
69) Hydro Air Systems Inc	20-43597	Briggs & Stratton Corporation	898	9/15/2020	Secured:	\$0.00	The debtors books and records show no

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
Susanne Errichetti PO Box 625 Patrick Springs, VA 24133					Administrative:	\$0.00	liability owed to this claimant, and the claimant attached no support to validate this claim.
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	
70) In Acquisition LLC  Alisha Mirabal 34 Tower St Hudson, MA 01749-1721	20-43597	Briggs & Stratton Corporation	1190	9/21/2020	Secured:	\$0.00	The claimant attached no invoice support to the proof of claim form and the Debtors can't locate the claimant in their books and records.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$552.51	
					Total:	\$552.51	
71) Jacks New Grass Inc  Jack Pendergrass, Owner 4798 Kinnamon Rd Winston Salem, NC 27103-9605	20-43597	Briggs & Stratton Corporation	2306	11/2/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant.
					Administrative:	\$3,016.73	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$3,016.73	
72) Jacobson Transportation Company, Inc.  Deborah L. Fletcher, Esq. FisherBroyles, LLP 338 Sharon Amity Road, #518 Charlotte, NC 28211	20-43597	Briggs & Stratton Corporation	2497	11/23/2020	Secured:	\$0.00	The claim relates to transportation services sub-contracted by FedEx, and are the responsibility of FedEx.
					Administrative:	\$29,524.62	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$29,524.62	
73) James B Manville  3 Island Creek Dr Seale, AL 36875-3128	20-43597	Briggs & Stratton Corporation	1533	10/6/2020	Secured:	\$0.00	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$2,897.70	
					Unsecured:	\$0.00	
					Total:	\$2,897.70	
74) James Smith  14316 Royal St George Athens, AL 35613-1710	20-43597	Briggs & Stratton Corporation	1929	10/2/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$13.44	
					Total:	\$13.44	
75) James Wier  26098 Fawnwood Court Bonita Springs, FL 34134	20-43597	Briggs & Stratton Corporation	1660	10/7/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$100,250.00	
					Total:	\$100,250.00	
76) Jean M Hartmann  7015 River Hammock Drive #203 Bradenton, FL 34212	20-43597	Briggs & Stratton Corporation	1675	10/7/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$4,320.00	
					Total:	\$4,320.00	

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
77) Jean M Hartmann  7015 River Hammock Drive #203 Bradenton, FL 34212	20-43597	Briggs & Stratton Corporation	1678	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$55,000.00 Total: \$55,000.00	Court approved the termination of the Retiree Health and Welfare Benefits
78) Jeffrey Lee  1265 45th Avenue Vero Beach, FL 32966	20-43597	Briggs & Stratton Corporation	1435	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,041.33 Unsecured: \$0.00 Total: \$2,041.33	The claimant did not attach enough support to validate the amount.
79) Jeffrey Zeiler  Timothy H. Posnanski Husch Blackwell LLP 555 E. Wells Street Suite 1900 Milwaukee, WI 53202	20-43597	Briggs & Stratton Corporation	1681	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate an allowed amount.
80) Jennifer Mullen  1441 State Hwy 164 Hubertus, WI 53033	20-43597	Briggs & Stratton Corporation	522	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$18,822.67 Total: \$32,472.67	Per the Debtors' books and records, the Debtors have no record of any liability due and owing to the claimant.
81) Jill M Firehammer  N8396 Schulz Rd Beaver Dam, WI 53916	20-43597	Briggs & Stratton Corporation	1470	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$3,543.84 Unsecured: \$0.00 Total: \$3,543.84	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are amounts owing to the claimant.
82) Jill M Firehammer  N8396 Schulz Rd Beaver Dam, WI 53916	20-43597	Briggs & Stratton Corporation	1471	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,927.75 Unsecured: \$0.00 Total: \$1,927.75	Court approved the termination of the Retiree Health and Welfare Benefits.
83) Jill M Firehammer  N8396 Schulz Rd Beaver Dam, WI 53916	20-43597	Briggs & Stratton Corporation	1473	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$6,807.24 Unsecured: \$0.00 Total: \$6,807.24	The claimant did not elect COBRA, therefore there is no liability owed by the Debtors to the claimant on account of COBRA
84) Joanne Olson, Estate Representative For Marlin Olson	20-43597	Briggs & Stratton Corporation	1425	10/5/2020	Secured: \$0.00 Administrative: \$0.00	This is a litigation-related claim, which has been dismissed and is therefore not



**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
	Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003					Priority:	\$0.00	a liability of the Debtors.
						Unsecured:	\$0.00	
						Total:	\$0.00	
85)	John S Scherrer  712 Shady Ln Oconomowoc, WI 53066-4173	20-43597	Briggs & Stratton Corporation	1475	10/6/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
86)	John Volmer  James C. Denorscia Marder Nass & Wiener PLLC 450 Seventh Ave New York, NY 10123	20-43597	Briggs & Stratton Corporation	2586	4/23/2021	Secured:	\$0.00	The cause of action to which this litigation-related claim relates occurred in November 2020 and is not a liability of the Debtors' estates.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$300,000.00	
						Total:	\$300,000.00	
87)	Jonesboro Bolt & Supply, Inc.  2516 Commerce Drive Jonesboro, AR 72401	20-43597	Briggs & Stratton Corporation	2298	10/30/2020	Secured:	\$0.00	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the Debtors' assets, Bucephalus Buyer, LLC.
						Administrative:	\$414.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$414.00	
88)	Joyce L Bezold  Joyce L Bezold Tr 6581 Murnan Rd Cold Spring, KY 41076	20-43597	Briggs & Stratton Corporation	2047	10/5/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
89)	Kayla Corbett  326 Pitts Drive Columbia, TN 38401	20-43597	Briggs & Stratton Corporation	556	9/14/2020	Secured:	\$0.00	Per the Debtors' books and records, the claimant voluntarily resigned so there are no amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$4,248.00	
						Unsecured:	\$0.00	
						Total:	\$4,248.00	
90)	Kellys Garage  2868 State Route 246 Perry, NY 14530-9710	20-43597	Briggs & Stratton Corporation	654	9/14/2020	Secured:	\$0.00	Claim asserts that no amount is owed to the claimant.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
91)	Kenneth Fleener  1421 E Henry Clay St Whitefish Bay, WI 53217	20-43597	Briggs & Stratton Corporation	1949	10/7/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
92) Kenneth Neuburg  459 Riverbend Ct Hartford, WI 53027	20-43597	Briggs & Stratton Corporation	457	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$5,573.33 Unsecured: \$0.00 Total: \$5,573.33	Per the Debtors' books and records, the claimant was paid severance amounts owing (\$4,463.33). Remaining amounts relate to Rebate program
93) Kevin Corbett  326 Pitts Drive Columbia, TN 38401-3840	20-43597	Briggs & Stratton Corporation	557	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$3,936.00 Unsecured: \$0.00 Total: \$3,936.00	Per the Debtors' books and records, the claimant voluntarily resigned so there are no amounts owing to the claimant.
94) Kimberly Barron  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1558	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,517.40 Unsecured: \$0.00 Total: \$1,517.40	The claimant did not attach enough support to validate the amount.
95) Krimhild Kling  325 Union Street Johnson Creek, WI 53038	20-43597	Briggs & Stratton Corporation	526	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$0.00 Total: \$13,650.00	Claimant is still an active employee so there is no severance liability.
96) Leonard Gary  104 Twin Lakes Dr St Augustine, FL 32084	20-43597	Briggs & Stratton Corporation	1196	9/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate an allowed amount.
97) Liberty Mutual Insurance  Attn K. Potvin Liberty Mutual Insurance Company 100 Liberty Way Dover, NH 03820	20-43597	Briggs & Stratton Corporation	2034	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Claim asserts that no amount is owed to the claimant.
98) Linda F. Head  c/o Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1457	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,236.40 Unsecured: \$0.00 Total: \$1,236.40	The claimant did not attach enough support to validate the amount.
99) Linda F. Head  C/O Therese A. Schellhammer	20-43597	Briggs & Stratton Corporation	1617	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$10,529.56	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority		Basis for Proposed Modification
	123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226					Unsecured:	\$0.00	
						Total:	\$10,529.56	
100)	Linda F. Head  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1620	10/7/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$13,650.00	
						Unsecured:	\$12,810.32	
						Total:	\$26,460.32	
101)	Linda Fleener  1421 E Henry Clay St Whitefish Bay, WI 53217	20-43597	Briggs & Stratton Corporation	1953	10/7/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
102)	Lois Ruttenberg  3137 Bonnyvale Rd Guilford, VT 05301	20-43597	Briggs & Stratton Corporation	2020	10/2/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$15,000.00	
						Total:	\$15,000.00	
103)	Lois Ruttenberg And Jane Costa  Lois Ruttenberg 3137 Bonnyvale Rd Guilford, VT 05301	20-43597	Briggs & Stratton Corporation	2021	10/2/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$15,000.00	
						Total:	\$15,000.00	
104)	Luke Davidson  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1560	10/7/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$1,203.03	
						Unsecured:	\$0.00	
						Total:	\$1,203.03	
105)	Luke Davidson  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff,, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1562	10/7/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$1,348.80	
						Unsecured:	\$0.00	
						Total:	\$1,348.80	
106)	Lynn M Hennecke  9109 N 70th St Milwaukee, WI 53223-2115	20-43597	Briggs & Stratton Corporation	1458	10/5/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$723.00	
						Total:	\$723.00	

**Exhibit A - No Liability Claims**  
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	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
107)	Mae Mosley  12742 Shady Ridge Lane Farragut, TN 37934	20-43597	Briggs & Stratton Corporation	1750	9/28/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$560,070.72 \$0.00 \$560,070.72	Court approved the termination of the Retiree Health and Welfare Benefits
108)	Magnetic Sensors Corporation  1365 N Mccan St Anaheim, CA 92806-1316	20-43597	Briggs & Stratton Corporation	196	8/19/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$2,326.54 \$2,326.54	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
109)	Mara Novakovich  5400 S. Honey Crk Dr. Greenfield, WI 53221	20-43597	Briggs & Stratton Corporation	648	9/14/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$8,000.00 \$8,000.00	Court approved the termination of the Retiree Health and Welfare Benefits
110)	Marcia Raven  568 Daniel St. Central Point, OR 97502	20-43597	Briggs & Stratton Corporation	2008	10/1/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$10,175.00 \$10,175.00	The debtors books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
111)	Mark A Rickert  1005 Payne St Murray, KY 42071-1957	20-43597	Briggs & Stratton Corporation	501	9/12/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$12,891.05 \$0.00 \$12,891.05	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
112)	Mary Griffin  3930 W Rochelle Ave Milwaukee, WI 53209-2345	20-43597	Briggs & Stratton Corporation	1384	10/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	Per the Debtors' books and records, the claimant is not owed any amounts under the Supplemental Employee Retirement Plan
113)	Mary L Janowitsch  2460 Stoney Ln Grafton, WI 53024	20-43597	Briggs & Stratton Corporation	1956	10/6/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$8,000.00 \$0.00 \$8,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
114)	Mary Weckerle  1057 Rocky Rd St Germain, WI 54558	20-43597	Briggs & Stratton Corporation	2119	10/7/2020	Secured: Administrative: Priority: Unsecured:	\$0.00 \$0.00 \$0.00 \$0.00	The claimant did not attach enough support to validate an allowed amount.

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
					Total:	\$0.00	
115) Mcdade, Christopher  120 Boyd Road Shorter, AL 36075	20-43597	Briggs & Stratton Corporation	1198	9/22/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	The claimant did not attach enough support to validate an allowed amount.
116) Mckenzie, Rick  PO Box 1515 Murray, KY 42071-0027	20-43597	Briggs & Stratton Corporation	207	8/21/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	The claimant did not attach enough support to validate an allowed amount.
117) Melody R Gelb  10725 Casey Dr Newport Richey, FL 34654	20-43597	Briggs & Stratton Corporation	908	9/14/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$10,000.00 \$0.00 \$0.00 \$10,000.00	The claimant did not attach enough support to validate the amount.
118) Meredith Freeland  119 E Monroe St Port Washington, WI 53074-1324	20-43597	Briggs & Stratton Corporation	809	9/28/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$3,000.00 \$0.00 \$3,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
119) Mitchel Barks  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1460	10/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$2,405.00 \$0.00 \$2,405.00	The claimant did not attach enough support to validate the amount.
120) Mitchel Barks  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1583	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$13,650.00 \$123,505.02 \$137,155.02	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
121) National Distribution Centers, LLC  Legal Department 2 Cooper Street Camden, NJ 08102	20-43597	Briggs & Stratton Corporation	260	8/26/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$1,272.18 \$1,272.18	The Debtors' books and records show no liability owed to this claimant.
122) National Distribution Centers, LLC	20-43597	Briggs & Stratton Corporation	2408	11/9/2020	Secured:	\$0.00	Asserted amounts were determined to

**Exhibit A - No Liability Claims**  
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Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
Legal Department 2 Cooper Street Camden, NJ 08102					Administrative:	\$2,781.00	be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$2,781.00	
123) National Grid  300 Erie Blvd W. Syracuse, NY 13202	20-43597	Briggs & Stratton Corporation	637	9/21/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$10,365.76	
					Total:	\$10,365.76	
124) Onofry Kuklinski  173643 Kennel Ln Hatley, WI 54440	20-43597	Briggs & Stratton Corporation	1147	9/18/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
					Administrative:	\$0.00	
					Priority:	\$50,000.00	
					Unsecured:	\$0.00	
					Total:	\$50,000.00	
125) Patricia Olszewski  5424 West Burnham Street West Milwaukee, WI 53214	20-43597	Briggs & Stratton Corporation	914	9/15/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$528.95	
					Total:	\$528.95	
126) Patricia Przanowski  8220 Heatherwood Dr. Florence, KY 41042	20-43597	Briggs & Stratton Corporation	816	9/28/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
					Administrative:	\$6,000.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$6,000.00	
127) Patricia S. Conger  718 Marywood Chase Houston, TX 77079	20-43597	Briggs & Stratton Corporation	1908	9/30/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$360.00	
					Total:	\$360.00	
128) Pfannenbergs Sales America LLC  68 Ward Road Lancaster, NY 14086	20-43597	Briggs & Stratton Corporation	211	8/21/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$2,422.50	
					Total:	\$2,422.50	
129) Philip Christianson  3010 Valley Ave West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	1728	9/25/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	

**Exhibit A - No Liability Claims**  
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Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
130) Phillip L. Damuth  5646 Whitaker Rd Lowville, NY 13367	20-43597	Briggs & Stratton Corporation	1395	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,543.30 Total: \$1,543.30	The claimant did not attach enough support to validate the amount.
131) Poclair Hydraulics, Inc.  1300 Grandview Parkway Sturtevant, WI 53177	20-43597	Briggs & Stratton Corporation	721	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,168.00 Total: \$2,168.00	The Debtors' books and records show no liability owed to this claimant.
132) Power Plus Cleaning Solutions  1525 N Endeavor Ln Ste O Anaheim, CA 92801-1156	20-43597	Briggs & Stratton Corporation	655	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$231.36 Total: \$231.36	The Debtors' books and records show no liability owed to this claimant.
133) Prairie View Roofing And Development  Prairie View Roofing and Development 3215 E. 97th Kearney, NE 68847-5209	20-43598	Allmand Bros., Inc.	39	9/21/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$339.30 Total: \$339.30	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
134) Rachele Lehr  Timothy H. Posnanski Husch Blackwell LLP 555 E. Wells Street, #1900 Milwaukee, WI 53202	20-43597	Briggs & Stratton Corporation	1530	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate the amount.
135) Ralph D Cossey  9356 State Route 94 E Murray, KY 42071	20-43597	Briggs & Stratton Corporation	1990	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$87,790.62 Total: \$101,440.62	Claimant is still an active employee so there is no severance liability.
136) Ralph Rush  3540 North Hualapai Way, Unit 1008 Las Vegas, NV 89129	20-43597	Briggs & Stratton Corporation	1153	9/18/2020	Secured: \$0.00 Administrative: \$10,000.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$10,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
137) Randall Jay Klotka	20-43597	Briggs & Stratton Corporation	1676	10/7/2020	Secured: \$0.00 Administrative: \$0.00	Court approved the termination of the Retiree Health and Welfare Benefits

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
	820 Prairie Run Grafton, WI 53024					Priority:	\$41,102.64	
						Unsecured:	\$0.00	
						Total:	\$41,102.64	
138)	Rebecca S. Giessel  536 W. Wisconsin Ave. Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	980	10/1/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$88.89	
						Total:	\$88.89	
139)	Rebecca S. Giessel  536 W. Wisconsin Ave. Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	981	10/1/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$16,000.00	
						Total:	\$16,000.00	
140)	Rhode Island Division Of Taxation  One Capitol Hill Providence, RI 02908-5802	20-43597	Briggs & Stratton Corporation	2537	12/14/2020	Secured:	\$0.00	After reviewing their books and records, the Debtors' have no record of owing the asserted taxes.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$3,217.94	
						Total:	\$3,217.94	
141)	Rhonda Bell  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1595	10/7/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$12,031.60	
						Unsecured:	\$0.00	
						Total:	\$12,031.60	
142)	Rhonda Bell  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1601	10/7/2020	Secured:	\$0.00	The claimant did not attach enough support to validate the amount.
						Administrative:	\$0.00	
						Priority:	\$1,292.60	
						Unsecured:	\$0.00	
						Total:	\$1,292.60	
143)	Richard Cleveland, Estate Representative For Looney Conway Cleveland Jr.  Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1427	10/5/2020	Secured:	\$0.00	The underlying case relating to this litigation-related claim was settled in 2017 and is therefore not a liability of the Debtors.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
144)	Richard M Guthrie  821 Florence Street Fort Atkinson, WI 53538	20-43597	Briggs & Stratton Corporation	514	9/4/2020	Secured:	\$0.00	Claimant is still an active employee so there is no severance liability.
						Administrative:	\$0.00	
						Priority:	\$13,650.00	
						Unsecured:	\$18,439.87	
						Total:	\$32,089.87	



**Exhibit A - No Liability Claims**  
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	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
145)	Richard M. Acker  W311S292 Wildwood Trl Delafield, WI 53018-3247	20-43597	Briggs & Stratton Corporation	1538	10/6/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$49,813.76	
						Total:	\$49,813.76	
146)	Ricky Bernard Lacy  6333 West Congress Street Milwaukee, WI 53218	20-43597	Briggs & Stratton Corporation	351	4/20/2021	Secured:	\$450,000.00	There is no known filed lawsuit relating to this individual and prima facie claim has not been met.
						Administrative:	\$0.00	
						Priority:	\$50,000.00	
						Unsecured:	\$0.00	
						Total:	\$500,000.00	
147)	Ricoh-Usa, Inc.  3920 Arkwright Rd., Suite 400 Macon, GA 31210	20-43597	Briggs & Stratton Corporation	2129	10/7/2020	Secured:	\$0.00	The claimant attached no support to validate this claim.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$74,663.88	
						Total:	\$74,663.88	
148)	Robert Kroll  704 N 40th St Sheboygan, WI 53081	20-43597	Briggs & Stratton Corporation	884	9/16/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees.
						Administrative:	\$0.00	
						Priority:	\$3,000.00	
						Unsecured:	\$0.00	
						Total:	\$3,000.00	
149)	Robert Owen Taylor Linda Sue Taylor Jt/ten  Robert Owen Taylor 3857 Old Hwy 50 Xenia, IL 62899	20-43597	Briggs & Stratton Corporation	657	9/14/2020	Secured:	\$0.00	Claimant asserts a claim on account of an equity interest that was cancelled under the Debtors' confirmed Plan.
						Administrative:	\$490.28	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$490.28	
150)	Robert Weber  P. O. Box 103 Kirkwood, CA 95646	20-43597	Briggs & Stratton Corporation	1293	9/21/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
151)	Roberta Saldivor  531 Gascoigne Drive Waukesha, WI 53188	20-43597	Briggs & Stratton Corporation	2490	11/23/2020	Secured:	\$0.00	The claimant did not attach enough support to validate an allowed amount.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$0.00	
152)	Roger Brinner  6885 N Ocean Blvd Apt 205	20-43597	Briggs & Stratton Corporation	480	9/10/2020	Secured:	\$0.00	The claimant attached no support to validate this claim.
						Administrative:	\$0.00	
						Priority:	\$12,500.00	

**Exhibit A - No Liability Claims**  
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Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
Ocean Ridge, FL 33435-3342					Unsecured:	\$0.00	
					Total:	\$12,500.00	
153) Roger Brinner  6885 N Ocean Blvd Apt 205 Ocean Ridge, FL 33435-3342	20-43597	Briggs & Stratton Corporation	479	9/10/2020	Secured:	\$0.00	The claimant attached no support to validate this claim.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$10,000.00	
					Total:	\$10,000.00	
154) Rosalie Malloy  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1605	10/7/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$11,649.15	
					Unsecured:	\$0.00	
					Total:	\$11,649.15	
155) Rosalie Malloy  C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1609	10/7/2020	Secured:	\$0.00	Fidelity accounts are held by claimant and not held by the Debtor. No amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$13,650.00	
					Unsecured:	\$26,264.31	
					Total:	\$39,914.31	
156) RS Hollinger & Sons  113 W Main St Mountville, PA 17554	20-43597	Briggs & Stratton Corporation	250	8/25/2020	Secured:	\$0.00	The claim is for a pre-petition product warranty liability, which was assumed by the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$6,269.58	
					Total:	\$6,269.58	
157) Ruth Fellows  3803 Flagstone Court Opelika, AL 36804	20-43597	Briggs & Stratton Corporation	1665	10/7/2020	Secured:	\$0.00	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$6,000.00	
					Total:	\$6,000.00	
158) S & W Auto Parts  C/O Dale Geiselman 1009 4th Avenue PO Box 615 Holdrege, NE 68949	20-43598	Allmand Bros., Inc.	69	11/2/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the Debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$244.04	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$244.04	
159) Sandberg Phoenix & Von Gontard P.C.  Sharon L. Stolte 4600 Madison Ave, Suite 1000 Kansas City, MO 64112	20-43597	Briggs & Stratton Corporation	2448	11/6/2020	Secured:	\$0.00	The claim relates to legal services provided on behalf of the debtors' insurance providers and is the responsibility of the same insurance providers.
					Administrative:	\$32,689.70	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$32,689.70	

**Exhibit A - No Liability Claims**  
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	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
160)	Scott A Funke  4093 S Wilshire Ct New Berlin, WI 53151-5261	20-43597	Briggs & Stratton Corporation	1518	10/6/2020	Secured:	\$0.00	Court approved the termination of the Retiree Health and Welfare Benefits
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$63,227.52	
						Total:	\$63,227.52	
161)	Seco Warwick Corporation  180 Mercer St Meadville, PA 16335-3618	20-43597	Briggs & Stratton Corporation	808	9/28/2020	Secured:	\$0.00	The Debtors' books and records show no liability owed to this claimant, and the claimant attached no support to validate this claim.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$277.50	
						Total:	\$277.50	
162)	Sharon E Plutschack  PO Box 1018 Kapaa, HI 96755	20-43597	Briggs & Stratton Corporation	1157	9/22/2020	Secured:	\$0.00	Per the Debtors' books and records, the Debtors have no record of any liability due and owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$62,286.00	
						Total:	\$62,286.00	
163)	Sid Tool Co., Inc., d/b/a MSC Industrial Supply Co  c/o Lynne B. Xerras, Esq. Holland & Knight LLP 10 St. James Avenue Boston, MA 02116	20-43597	Briggs & Stratton Corporation	2486	11/23/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
						Administrative:	\$201,380.31	
						Priority:	\$0.00	
						Unsecured:	\$0.00	
						Total:	\$201,380.31	
164)	Steven G Gleixner  4155 N 137th St Brookfield, WI 53005	20-43597	Briggs & Stratton Corporation	888	9/15/2020	Secured:	\$0.00	Per the Debtors' books and records, the claimant did not elect COBRA so there are no amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$14,073.62	
						Unsecured:	\$0.00	
						Total:	\$14,073.62	
165)	Tammy L Powers  788 Shoreline Drive Jacksons Gap, AL 36861	20-43597	Briggs & Stratton Corporation	1666	10/7/2020	Secured:	\$0.00	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$3,391.86	
						Total:	\$3,391.86	
166)	Tammy L Powers  788 Shoreline Drive Jacksons Gap, AL 36861	20-43597	Briggs & Stratton Corporation	1667	10/7/2020	Secured:	\$0.00	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are no amounts owing to the claimant.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$4,891.86	
						Total:	\$4,891.86	
167)	Tammy L. Schoen  N53 W35162 Lighthouse Lane Oconomowoc, WI 53066	20-43597	Briggs & Stratton Corporation	1062	10/2/2020	Secured:	\$0.00	Per the Debtors' books and records, the claimant is not covered under the Executive Life Program so there are no amounts owing to the claimant. Michael Schoen is covered under the program.
						Administrative:	\$0.00	
						Priority:	\$0.00	
						Unsecured:	\$1,263,884.30	

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	Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
						Claim Amount and Priority		
						Total:	\$1,263,884.30	Senior is covered under the program and has filed a separate claim
168)	Thomas C. Berry  Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1415	10/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	The underlying case relating to this litigation-related claim has been dismissed, with no resulting liability for the Debtors.
169)	Thomas D Neary Inc  3365 Gateway Road Brookfield, WI 53045-5111	20-43597	Briggs & Stratton Corporation	906	9/15/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$6,712.00 \$0.00 \$0.00 \$6,712.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
170)	Timothy R Carlton  613 Jennifer Drive Auburn, AL 36830-3683	20-43597	Briggs & Stratton Corporation	371	9/8/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$8,242.38 \$0.00 \$8,242.38	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are amounts owing to the claimant.
171)	Tiocco-Filmax, A Division Of Filmax, LLC  Attn Jamie Young 6775 Corporate Park Drive Loudon, TN 37774	20-43597	Briggs & Stratton Corporation	2369	11/5/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$150.00 \$0.00 \$0.00 \$150.00	The claimant attached no support to validate this claim.
172)	Travis A. Johnson  5025 S Figueroa Ln Mesa, AZ 85212	20-43597	Briggs & Stratton Corporation	1249	9/18/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$893.75 \$893.75	The claimant did not attach enough support to validate the amount.
173)	Trent Ringstaff  667 Old Hickory Rd Kirksey, KY 42054	20-43597	Briggs & Stratton Corporation	2127	10/7/2020	Secured: Administrative: Priority: Unsecured: Total:	\$25,041.69 \$0.00 \$0.00 \$0.00 \$25,041.69	Per the Debtors' books and records, the Debtors have paid the severance amounts owing to the claimant.
174)	Trimark Corporation  500 Bailey Ave New Hampton, IA 50659-1063	20-43597	Briggs & Stratton Corporation	1998	10/6/2020	Secured: Administrative: Priority: Unsecured: Total:	\$0.00 \$0.00 \$0.00 \$997.70 \$997.70	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
175)	Twin State Tractor & Equipment Inc	20-43597	Briggs & Stratton Corporation	904	9/15/2020	Secured:	\$0.00	Asserted amounts were determined to

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
PO Box 368 Enfield, NH 03748					Administrative:	\$2,683.88	be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$2,683.88	
176) Ultra Tool And Manufacturing Inc  Melissa Karis, Controller W194N11811 McCormick Dr Germantown, WI 53022-2464	20-43597	Briggs & Stratton Corporation	1168	9/22/2020	Secured:	\$0.00	The Debtors' records do not reflect the asserted invoices as owed to the vendor.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$12,620.10	
					Total:	\$12,620.10	
177) Unist Inc  4134 36th Street Se Grand Rapids, MI 49512	20-43597	Briggs & Stratton Corporation	2455	11/17/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$657.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$657.00	
178) Vesna Savic  4944 S 55Th St. Apt. Aa 102 Greenfield, WI 53220	20-43597	Briggs & Stratton Corporation	1170	9/21/2020	Secured:	\$0.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$8,000.00	
					Total:	\$8,000.00	
179) Voestalpine Precision Strip, LLC  Catrina Heroux Voestalpine Precision Strip 3052 Interstate Parkway Brunswick, OH 44212	20-43597	Briggs & Stratton Corporation	1800	9/28/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$3,688.66	
					Total:	\$3,688.66	
180) W.W. Grainger, Inc.  401 South Wright Road W4W.R47 Janesville, WI 53546	20-43600	Briggs & Stratton Tech, Llc	21	10/2/2020	Secured:	\$0.00	The claim is a duplicate claim of court claim #2042 and no liability beyond claim #2042 exists.
					Administrative:	\$28,727.34	
					Priority:	\$0.00	
					Unsecured:	\$22,549.93	
					Total:	\$51,277.27	
181) W.W. Grainger, Inc.  401 South Wright Road W4W.R47 Janesville, WI 53546	20-43599	Briggs & Stratton International, Inc.	22	10/2/2020	Secured:	\$0.00	The claim is a duplicate claim of court claim #2042 and no liability beyond claim #2042 exists, if any.
					Administrative:	\$28,727.34	
					Priority:	\$0.00	
					Unsecured:	\$22,549.93	
					Total:	\$51,277.27	
182) Waipahu Lawn Equipment  #6A 94-150 Leoleo St Waipahu, HI 96797	20-43597	Briggs & Stratton Corporation	504	9/13/2020	Secured:	\$0.00	The claim is a duplicate claim of court claim #2042 and no liability beyond claim #2042 exists, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority	Basis for Proposed Modification
183) Warner Frazier  11405 N Justin Dr Mequon, WI 53092-3564	20-43597	Briggs & Stratton Corporation	1171	9/22/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$86,250.00 Total: \$86,250.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees.
184) Wells Vehicle Electronics  Attn Finance A/R PO Box 70 Fond Dulac, WI 54936	20-43597	Briggs & Stratton Corporation	2464	11/19/2020	Secured: \$0.00 Administrative: \$3,544.50 Priority: \$0.00 Unsecured: \$0.00 Total: \$3,544.50	The invoice contains both a pre-petition invoice, which was late-filed after the general bar date of October 7, 2020, as well as a post-petition invoice which was assumed by the buyer of substantially all of the Debtors' assets, Bucephalus Buyer, LLC
185) Wendell G. Finch  276 Johnson Dr Sylvania, GA 30467	20-43597	Briggs & Stratton Corporation	2420	11/13/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant did not attach enough support to validate an allowed amount.
186) WestRock CP, LLC And Affiliates  1825 Eye Street, Nw, Suite 900 Washington, DC 20006	20-43597	Briggs & Stratton Corporation	2423	11/13/2020	Secured: \$0.00 Administrative: \$121,985.30 Priority: \$0.00 Unsecured: \$0.00 Total: \$121,985.30	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
187) William Elliott Thames  1057 Runningvine Lane Auburn, AL 36830	20-43597	Briggs & Stratton Corporation	717	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,068.68 Total: \$2,068.68	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are amounts owing to the claimant.
188) William Knaack  N3042 Circle Dr Cascade, WI 53011-1328	20-43597	Briggs & Stratton Corporation	891	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,000.00 Total: \$1,000.00	The Debtors have no liability for this claim, as life insurance was terminated post closing for all employees
189) William Lambert  692 Highland Road Auburn, AL 36830	20-43597	Briggs & Stratton Corporation	602	9/17/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$6,402.57 Unsecured: \$0.63 Total: \$6,403.20	Per the Debtors' books and records, the salary reduction occurred prior to bankruptcy so there are amounts owing to the claimant.
190) WW Grainger Inc	20-43597	Briggs & Stratton Corporation	2439	11/11/2020	Secured: \$0.00 Administrative: \$36,252.45	Asserted amounts were determined to be post-petition and are a liability of the

**Exhibit A - No Liability Claims**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
401 South Wright Rd W4Ws50 Janesville, WI 53546-8729					Priority:	\$0.00	Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Unsecured:	\$0.00	
					Total:	\$36,252.45	
191) XPO Logistics Freight, Inc.  Deborah L. Feltcher, Esq. FisherBroyles, LLP 338 Sharon Amity Road, #518 Charlotte, NC 28211	20-43597	Briggs & Stratton Corporation	2496	11/23/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$118,970.51	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$118,970.51	
192) XPO Logistics Supply Chain Canada, Inc.  Deborah L. Fletcher, Esq. FisherBroyles, LLP 338 Sharon Amity Road, #518 Charlotte, NC 28211	20-43597	Briggs & Stratton Corporation	2499	11/23/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$61,458.29	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$61,458.29	
193) XPO Logistics, LLC  Deborah L. Fletcher, Esq. FisherBroyles, LLP 338 Sharon Amity Road, #518 Charlotte, NC 28211	20-10575	Billy Goat Industries, Inc.	123	11/23/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$63,650.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$63,650.00	
194) XPO Logistics, LLC  Deborah L. Fletcher, Esq. FisherBroyles, LLP 338 Sharon Amity Road, #518 Charlotte, NC 28211	20-43597	Briggs & Stratton Corporation	2498	11/23/2020	Secured:	\$0.00	Asserted amounts were determined to be post-petition and are a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$63,650.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$63,650.00	
195) Zhongding USA Cadillac Inc DBA Michigan Rubber Products  Zhongding USA Cadillac, Inc. 1200 Eighth Avenue Cadillac, MI 49601	20-43597	Briggs & Stratton Corporation	2310	11/2/2020	Secured:	\$0.00	Claim asserts post-petition amounts, which is a liability of the Court-approved purchaser of substantially all of the debtors' assets, Bucephalus Buyer, LLC.
					Administrative:	\$4,057.65	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$4,057.65	

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Debtors.	§	
	§	Hearing Date: August 5, 2021
	§	Hearing Time: 2:00 p.m. (Central Time)
	§	Hearing Location: Courtroom 5 North
	§	111 S. 10th St., St. Louis, MO 63102

**THE PLAN ADMINISTRATOR'S NINETEENTH  
OMNIBUS OBJECTION TO CLAIMS ON GROUNDS OF NO LIABILITY**

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.

IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37<sup>TH</sup> FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON JULY 29, 2021.

FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.

Alan D. Halperin as Plan Administrator (the “**Plan Administrator**”) under the *Amended Joint Chapter 11 Plan of Briggs & Stratton Corporation and its Affiliated Debtors*, dated November 9, 2020 (the “**Plan**”, Docket No. 1226),<sup>1</sup> respectfully represents as follows in support of this omnibus objection to claims (the “**Objection**”) that are No Liability Claims (the

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<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.



“**No Liability Claims**”). The Plan Administrator submits that the Wind-Down Estates have no liability based on the reasons expressly stated in **Exhibit A** attached hereto. The reasons for objection include, but are not limited to: the claim has already been paid; the Debtors’ books and records do not support a claim nor did claimant provide sufficient evidence to support a claim; or the claim is for post-petition amounts that are the responsibility of the Purchaser. In further support of the Objection, attached hereto as **Exhibit B** is the *Declaration of Alan D. Halperin in Support of the Plan Administrator’s Nineteenth Omnibus Objection to Claims on Grounds of No Liability* (the “**Halperin Claims Declaration**”):

**Background**

1. On July 20, 2020 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On August 5, 2020, the United States Trustee appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) in these chapter 11 cases pursuant to section 1102 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors’ chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure for the Eastern District of Missouri (the “**Local Rules**”).

3. On September 15, 2020, the Court entered an order authorizing the Debtors to sell substantially all of their assets<sup>2</sup> to Bucephalus Buyer, LLC (the “**Purchaser**”) and on September 21, 2020, the Debtors closed the Sale Transaction.<sup>3</sup> On December 16, 2020, the Debtors filed the Plan, which was confirmed by the *Findings of Fact, Conclusions of Law, and Order Confirming the Plan* on December 18, 2020 [Docket No. 1485] (the “**Confirmation Order**”).

4. The Effective Date of the Plan occurred on January 6, 2021 and the *Notice of Entry of Order Confirming the Plan and Occurrence of the Effective Date* [Docket No. 1538] was filed, at which time the Creditors’ Committee was relieved of its duties and the Plan Administrator took over the administration of the Wind-Down Estates in accordance with the Plan. The Wind-Down Estates continue to honor their post-closing sale obligations, wind down the estates, and otherwise work on concluding these chapter 11 cases.

5. On February 12, 2020, the Bankruptcy Court entered that certain Order Approving Claims Objection Procedures, Claims Hearing Procedures and Granting Related Relief [Docket No. 1614] (the “**Omnibus Procedures Order**”), which, among other things, increased the number of claims authorized to be filed in an omnibus claim objection such as this Objection to three hundred fifty (350) Claims.

### **Jurisdiction**

6. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

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<sup>2</sup> *Order (I) Authorizing the Sale of the Assets and Equity Interests to the Purchaser Free and Clear of Liens, Claims, Interests, and Encumbrances; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* [Docket No. 898].

<sup>3</sup> *See Notice of (I) Filing of Amendment to Stock and Asset Purchase Agreement, And (II) the Occurrence of Closing of the Sale Transaction* [Docket No. 964].

### **Relief Requested**

7. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007(C), the Plan Administrator respectfully requests entry of an order (the “**Proposed Order**”),<sup>4</sup> disallowing the No Liability Claims listed on **Exhibit A**.

### **Claims Reconciliation**

8. On August 23, 2020, the Debtors filed their schedules of assets, liabilities, current income, expenditures, executory contracts, and unexpired leases and statements of financial affairs, as required by section 521 of the Bankruptcy Code [Docket Nos. 555–559] (collectively, the “**Schedules**”).

9. On August 24, 2020, the Court entered an order [Docket No. 564] (the “**Bar Date Order**”), which, among other things, established (a) October 7, 2020 as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Debtors that arose before the Petition Date to file a proof of such claim in writing (the “**General Bar Date**”), and (b) January 19, 2021 as the deadline for all governmental entities holding or wishing to assert a “claim” against any of the Debtors that arose before the Petition Date to file a proof of such claim in writing.

10. As of the date hereof, approximately 2,950 proofs of claim (the “**Proofs of Claim**”) have been filed against the Debtors. The Plan Administrator and his advisors have been working diligently to review these Proofs of Claim, including any supporting documentation filed therewith. For the reasons set forth below, and based on their review to date, the Plan Administrator has determined that the claims objected to herein should be disallowed.

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<sup>4</sup> Copies of the Proposed Order will be made available on the Debtors’ case information website at <http://www.kccllc.net/Briggs>.

11. As set forth in the Halperin Claims Declaration, the Plan Administrator and his professionals have examined each No liability Claim, all documentation provided by the claimant with respect to each No Liability Claim, and the Debtors' respective books and records, and have determined in each case the No Liability Claims are claims that should be disallowed. The reasons for objection include, but are not limited to: the claim has already been paid; the Debtors' books and records do not support a claim nor did claimant provide sufficient evidence to support a claim; or the claim is for post-petition amounts that are the responsibility of the Purchaser. Accordingly, each such corresponding Proof of Claim should be disallowed, as described on **Exhibit A** annexed hereto.

**Relief Requested Should Be Granted**

12. Pursuant to section 502 of the Bankruptcy Code, "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Bankruptcy Rule 3001(f) provides that a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and amount of the claim under section 502(a) of the Bankruptcy Code. FED. R. BANKR. P. 3001(f). The act of filing an objection alone "does not deprive the proof of claim of presumptive validity unless the objection is supported by substantial evidence." *In re Austin*, 538 B.R. 543, 545 (Bankr. E.D. Mo. 2015) (citing *In re McDaniel*, 264 B.R. 531, 533 (B.A.P. 8th Cir. 2001)). If the objection presents evidence "rebutting the claim," then "the claimant must produce additional evidence to prove the validity of the claim by a preponderance of the evidence." *In re Austin*, 538 B.R. at 545 (citing *In re Gran*, 964 F.2d 822, 827 (8th Cir. 1992); *see also In re Peabody Energy Corp.*, Case No. 16-42529 (BSS), 2017 WL 4570700, at \*7 (Bankr. E.D. Mo. Oct. 12, 2017); *In re Seagraves*, Case No. 12-49433 (BSS), 2015 WL 2026707, at \*2 (Bankr. E.D. Mo. Apr. 30, 2015); *Dove-Nation v. eCast Settlement Corp. (In re Dove-Nation)*, 318 B.R. 147, 152

(B.A.P. 8th Cir. 2004) (*citing In re Innovative Software Designs, Inc.*, 253 B.R. 40, 44 (B.A.P. 8th Cir. 2000)).

13. The claims in the attached **Exhibit A** have all been identified as claims for which the Debtors have no liability for one of several reasons. The reasons for objection are, but are not limited to: the claim has already been paid; the Debtors' books and records do not support a claim nor did claimant provide sufficient evidence to support a claim; or the claim is for post-petition amounts that are the responsibility of the Purchaser. Accordingly, the Plan Administrator (a) objects to the No Liability Claims listed on **Exhibit A** hereto, and (b) seeks entry of an order disallowing the No Liability Claims in their entirety.

#### **Reservation of Rights**

14. Nothing contained herein is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or the Wind-Down Estates, (ii) a waiver or limitation of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

#### **Notice**

15. Notice of this Objection will be provided to (i) the Office of the United States Trustee for the Eastern District of Missouri (Attn: Sirena Wilson, Esq.); (ii) the Claimant; (iii) any other party that has requested notice pursuant to Bankruptcy Rule 2002; and (iv) any other party entitled to notice pursuant to the Omnibus Procedures Order (collectively, the "Notice Parties").

**No Previous Request**

16. No previous request for the relief sought herein has been made by the Debtors or the Plan Administrator to this or any other court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Plan Administrator respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: June 29, 2021  
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

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Christopher J. Lawhorn, #45713MO  
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*Local Counsel to the Plan Administrator*

-and-

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*Counsel to the Plan Administrator*